



**BY EMAIL and RESS**

**Mark Rubenstein**  
mark@shepherdrubenstein.com  
Dir. 647-483-0113

Ontario Energy Board  
2300 Yonge Street  
27th Floor  
Toronto, Ontario  
M4P 1E4

June 13, 2017  
Our File: EB20160086

**Attn: Kirsten Walli, Board Secretary**

Dear Ms. Walli:

**Re: EB-2016-0086 – InnPower Corporation – SEC Interrogatories**

We are counsel to the School Energy Coalition (“SEC”). Pursuant to Procedural Order No.2, please find SEC’s interrogatories on specific services charges.

Yours very truly,  
**Shepherd Rubenstein P.C.**

*Original signed by*

Mark Rubenstein

cc: Wayne McNally, SEC (by email)  
Interested parties (by email)

**ONTARIO ENERGY BOARD**

**IN THE MATTER OF** the *Ontario Energy Board Act, 1998*, S.O. 1998, c.15, Schedule B;

**AND IN THE MATTER OF** an Application by InnPower Corporation under Section 78 of the *Ontario Energy Board Act, 1998* for an Order or Orders approving or fixing just and reasonable rates and other service charges for the distribution of electricity as of July 1, 2017.

**INTERROGATORIES**

**ON BEHALF OF THE**

**SCHOOL ENERGY COALITION**

**8-SEC-45**

[Ex.8, p.15] With respect to the proposed specific charge for access to power poles, please provide:

- a. The basis for the rate and hours used, for each ‘admin’, ‘replacement’ and ‘field work’ tasks, as well as the basis for the number of occurrences.
- b. A breakdown and explanation of the basis for the net embedded cost per pole calculation.
- c. A breakdown and explanation of the basis for pole maintenance per pole calculation.
- d. The basis of the 6627 ‘Poles with Attachments’ number.
- e. For each of 2016 and 2017, the number of in-service poles.
- f. The basis for using a 3% capital carrying cost per year.
- g. The each of 2016 and 2017, the Applicant’s pre-tax weight average cost of capital.
- h. For each of 2016 and 2017, the number of third-party attachers (wireline, wireless, streetlight etc) billed.
- i. Are there any attachers on poles that are not billed? If so, please provide the number for each of 2016 and 2017, and details why they are not billed.

Respectfully submitted on behalf of the School Energy Coalition this June 13<sup>th</sup>, 2017.

*Original signed by*

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Mark Rubenstein  
Counsel for the School Energy  
Coalition